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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>PRAKAZREL MICHEL,</p> <p>Plaintiff,</p> <p>-against-</p> <p>LAURYN NOELLE HILL and MLH TOURING, INC., a Delaware Corporation,</p> <p>Defendants.</p>	<p>Civ. Action No. 1:24-cv-07403-JKG</p>
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JOINT RULE 26(f) REPORT AND DISCOVERY PLAN

*Scheduling
Order.*

Pursuant to Fed. R. Civ. P. 26(f) and the Court's Order Setting Scheduling Conference,
Plaintiff PRAKAZREL MICHEL and Defendants LAURYN NOELLE HILL and MLH

TOURING, INC. hereby jointly submit this Rule 26(f) report and discovery plan. The Parties met and conferred and discussed, among other things, the following:

1. Court's Civil Schedule Order Subjects

The parties propose five months from the date of this report, until July 17, 2025, to complete discovery. The parties believe this additional time for completion of discovery is reasonable and appropriate because plaintiff's counsel is scheduled to be in a one week jury trial in the United States District Court for the Southern District of New York commencing on April 28, 2025 with pretrial filings due on March 24, 2025; because plaintiff anticipates taking at least 12 depositions in this matter; and due to plaintiff's and defendant Hill's Spring 2025 professional commitments.

The parties propose a dispositive motion completion date 60 days after the completion of discovery, on September 17, 2025.

The parties propose a deadline to submit a joint pretrial order, motions in limine or motions to bifurcate, jury charges and *voir dire* requests of 60 days after the dispositive motion deadline, on November 17, 2025.

The parties propose a ready for trial date on 72 hours' notice on or after December 3, 2025. The estimated time for trial is six days and this is a jury trial.

Additional Fed.R.Civ.P. 26(f)(3) Subjects

(A) The parties do not believe any changes should be made in the timing, form or requirement for disclosures under Rule 26(a). The parties have agreed to exchange initial disclosures on February 27, 2025.

(B) Plaintiff intends to conduct discovery on the following subjects:

1. The financial books and records of Defendant MLH Touring, Inc.

2. The financial books and records of Fugees Worldwide, Inc.
3. All documents that refer to and relate to the 2023 Tour Agreement between Defendants MLH, Hill and Plaintiff, and any of the venues that were scheduled for performances as part of the Ms. Lauryn Hill & Fugees: Miseducation of Lauryn Hill 25th Anniversary Tour (the “2023 Fugees Tour”) and the continuation of the Ms. Lauryn Hill & Fugees: Miseducation of Lauryn Hill 25th Anniversary Tour (the “2024 Fugees Tour”) (jointly, the ”Fugees Tours”).
4. All documents that refer to and relate to the 2023 Artist Agreement between and among, Plaintiff, Wyclef Jean, Lauryn Hill and Fugees Worldwide, Inc.
5. Defendants’ performance of their obligations under the 2023 Tour Agreement and the 2023 Artist Agreement relating to the Fugees Tours.
6. Defendant Lauryn Hill’s conduct as an officer, shareholder or director of MLH Touring, Inc. and Fugees Worldwide, Inc.
7. All documents relating to the performance of the Fugees Tours, including all communications exchanged between or among Defendants and/or their representatives, on the one hand, and either of Plaintiff, Live Nation, Mammoth, Inc., merchandise companies, and any participants on the Fugees Tours, on the other.
8. All documents exchanged between or among Defendants, their representatives, Live Nation, Mammoth, Inc., and Wyclef Jean.
9. All documents that refer to and relate to the proposed appearance of The Fugees at the Coachella Festival in 2024, and any other proposed appearances of the Fugees at Coachella in prior years.

10. All merchandise agreements that refer or relate to THE FUGEES trademark, and the name, likeness and image of The Fugees members.

11. All documents that refer to and relate to the agreement between Defendants and Mammoth, Inc. for the 2023 Tour and the performance of the parties to that agreement.

12. All documents that refer to and relate to the agreement between Defendants and Live Nation for the 2024 Tour and the performance of the parties to that agreement.

Defendants intend to conduct discovery on the circumstances under which the parties entered into the agreements at issue herein; plaintiff's efforts to extract additional funds from defendants; plaintiff's non-performance of his obligations under the agreements; plaintiff's third-party communications in breach of the agreements; and the factual bases, if any, for the material allegations in plaintiff's complaint.

(C) The parties do not anticipate any issues about disclosure, discovery, or preservation of electronically stored information, including the form or forms in which it should be produced.

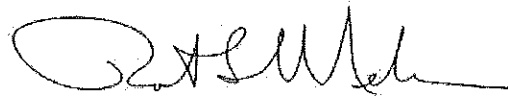
(D) The parties do not anticipate any issues about claims of privilege or of protection as trial-preparation materials, including—if the parties agree on a procedure to assert these claims after production—whether to ask the court to include their agreement in an order under Federal Rule of Evidence 502.

(E) The parties do not anticipate that any changes should be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule, or that other limitations should be imposed.

(F) The parties anticipate stipulating to request the issuance of a pretrial protective order to protect the confidentiality of certain private business, financial and personal information concerning plaintiff and defendant Hill.

DATED: February 17, 2025

MELONI & McCaffrey LLC



By: _____

Robert S. Meloni

Attorneys for Plaintiff Prakazrel Michel

DATED: February 17, 2025

ROSENBERG, GIGER & PERALA P.C.

By: _____

s/John J. Rosenberg

John J. Rosenberg

*Attorneys for Defendants Lauryn Noelle Hill and MLH
Touring, Inc.*

DATED: February 17, 2025

KING, HOLMES, PATERNO & SORIANO, LLP

By: _____

s/ Stephen D. Rothschild

Stephen D. Rothschild

*Attorneys for Defendants Lauryn Noelle Hill and MLH
Touring, Inc.*

*so ordered.
per Collet
2/18/25 J.S.D.S*